

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,)	
)	
Petitioner/Judgment Creditor)	
)	
vs.)	
)	
AVON CAPITAL, LLC,)	
)	
Respondent/Judgment Debtor,)	
)	
ASSET SERVICING GROUP, LLC,)	
)	
Respondent, Garnishee,)	Case No. 14-FJ-05-HE
)	
SDM HOLDINGS, LLC,)	
)	
Respondent/Garnishee,)	
)	
and)	
)	
AVON CAPITAL, LLC, a Wyoming Limited)	
Liability Company,)	
)	
Intervenor.)	

PETITIONER’S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and 12 O.S. § 2056, Petitioner Universitas Education, LLC (“Universitas”) hereby moves this Court to enter summary judgment that: (i) Avon Capital, LLC, a Wyoming Limited Liability Company is an alter ego of Avon Capital, LLC, a Connecticut Limited Liability Company, (ii) Avon Capital, LLC, a Wyoming Limited Liability Company is an alter ego of Avon Capital, LLC a Nevada Limited Liability Company, (iii) Avon Capital, LLC, a Wyoming Limited Liability Company is liable for Universitas’ judgment against Avon Capital, LLC, and (iv) Avon

Capital, LLC a Wyoming Limited Liability Company's ownership of SDM Holdings, LLC must be assigned to Universitas to satisfy Universitas' judgment. In support of this motion, Universitas relies on its opening brief in support of this motion, declaration in support of this motion, the exhibits attached therewith, and all motions and papers on file with this Court.

WHEREFORE, Universitas respectfully requests that the Court enter an order granting this Motion in its entirety, together with such other and further relief as this Court deems just and fit.

Dated: February 11, 2020
Alexandria, VA

Respectfully submitted,

/s/ Joseph L. Manson III

Admitted *Pro Hac Vice*

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Counsel for Universitas Education, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February 2020, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants on record:

John D. Stiner
Joseph H. Bocock
Alan Rupe
Gerald Green
Melvin McVay
Clayton Ketter
Joshua Greenhaw
Nanette Kalcik

/s/ Joseph L. Manson III